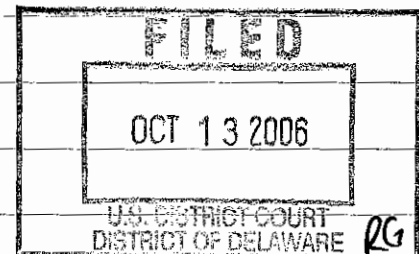


In the United States District Court  
For the District of Delaware

James St. Louis  
plaintiff  
✓

Civil Case No.  
06-236-SLR

Lt. Cheryl Morris, Del. Chris  
Klein, and Delaware Prisons  
(all officers and Supervisors  
including State of Delaware)



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Motion For Leave to File An  
Amended Complaint per Judge Sue  
Robinson Conclusion for  
retaliation claim.

Plaintiff James St. Louis pursuant to  
memorandum order dated September  
22, 2006 replies motion for  
Cognizable retaliation claim.

1. Plaintiff on his Amended Complaint  
named Lt Morris, Del Chris Klein and  
Delaware Prisons (all officers and Supervisors  
including State of Delaware.

2. As per memorandum plaintiff  
wishes to drop, as per number 6 orders,  
"all officers and supervisors of the prisons  
systems in the State of Delaware"

3. Plaintiff wishes to keep Lt Morris

the main person involved in plaintiff's retaliation claim. Plaintiff also wishes to include Director Chris Klein, administrator Michael Knight, Lt LeGates, Lt Lehman, Sgt. Johnson, Sgt. Boring for their participation of inactivity to protect plaintiff's due process rights and his guaranteed protections under the 8<sup>th</sup> Amendment. <sup>and anyone else</sup> the court deems appropriate.

4. Plaintiff includes a exhibit A the facts and involvement of the Ketcher personnel and their actions and inactions, in not only constitutional violations of due process but also for failure to follow procedural rules set up by their own administration to protect inmates rights.

5. Plaintiff asks this court for each to be held in their individual capacity as well as official capacity.

6. Plaintiff is asking for an injunction to force these officers and participants to follow their own procedures to protect future violations of inmates.

7. Plaintiff also ask this court to protect the names of inmates provided to this court to be protect from retaliation from officers named.

8. Plaintiff also ask for compensatory damages as well as punitive damages and as prior filing "front money" or "front pay"

Respectfully submitted

James St. Louis Jr.

SB1 446518

1181 Paddock Rd.

Amgona Delaware

### Certificate of Service

I hereby certify that I James St. Louis have filed through Delaware Correctional Center mail motion to file complaint per Judge Sue Rabensson, a retaliation claim two copies of the same document, because of state employees to the following participant.

Deputy Attorney General

Department of Justice

820 N. French Street

Wilmington, DE 19801

Del Bar Id No. 3759



Exhibit A

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facts:

The basic problem started 3/8/05 with a meeting with Lt. Morris & Lt. Legates after St. Louis had complained to Lt. Legates about Constitutional issues and threats and extortion being done by 1<sup>st</sup> Cook Govan on the 3<sup>rd</sup> cooks under "his" supervision. At the meeting we were told that Govan ran the kitchen no matter what and some of the cooks needed to be threatened per Lt Morris. 1<sup>st</sup> Cook Govan was present. On 3/19/05 another meeting about threats and firing inmates by 1<sup>st</sup> Cook was held and Lt Morris said everyone had to follow procedures before anyone could be fired. 1<sup>st</sup> we had to give notice of infraction so there would be a counseling report done to show history of problems and then on the second complaint they could be fired. She also asked us, at that time, who we wanted to be fired out of the kitchen and talked about how to achieve this. She informed us she would talk to "her" officers and have them comply to our wishes. Govan and St. Louis had seniority in the kitchen and were the heads of Morris teams. Since then, interviews for promotions were done with Govan and his second cooks.

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with Govan offering questions and promotions to inmates who paid him with commissary. These who paid got the questions those who didn't, didn't get promotion.

St. Louis refused to participate in these practices and told Lt Morris so. 2 weeks before St. Louis was fired Govan threatened him personally and St. Louis went to Zone One officer Johnson and after talking to witnesses reprimanded verbally Govan who proceeded to Lt Morris and had St. Louis called into her office. Govan asked no demanded to have St. Louis fired. and Lt Morris said this couldn't be done because of no prior problems or disciplinary actions. St. Louis left meeting and Govan and Morris talked for about 1 more hour. Govan returned telling St. Louis his time was limited. St. Louis has brought these violations to authorities in charge per procedures and was told by Lt Morris if anyone ever goes over her head to her bosses would feel her wrath. 2 week later on 12/7/05 St. Louis got accused by Boring of lying and Morris ordered her per Lt Bradley to write St. Louis up on 12/8/05 Lt Morris held a fact finding meeting and called

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St. Louis out of his building to be interviewed. It was St. Louis' day off and he knew nothing about disciplinary matters up yet. He entered Lt. Lehmon's office and was questioned by Lt. Morris about the lying issue from Mr. Bouring. Still no information that there was a write up on St. Louis. On leaving St. Louis returned to his building. The next day St. Louis returned to work and Lt. Morris was off along with 1st Cook Govan. St. Louis did his work as usually done and was approached by the other 2nd Cook who asked why I was there. He said 1st Cook Govan said I was fired and he was in charge. St. Louis proceeded to Lt. Lehmon's office in charge and addressed the issue saying he was involved at his fact finding meeting. St. Louis asked Lt. Lehmon if he was terminated or had a disciplinary report and he said no to go back to work. He said he would contact Lt. Morris. About 45 minutes later St. Louis was called into Lt. Lehmon's office and was told Lt. Morris had terminated him and that a disciplinary report would be forthcoming. I asked Lt. Lehmon



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what about a disciplinary hearing and he said this was Lt Morris and didn't want to be involved.

He also said as a friend he would appeal the action if he were me.

As I was getting ready to leave Lt Lehman presented me with a disciplinary report dating 48 hours prior to termination that Lt Morris ordered to be written up, investigated by Lt Morris without due process for St. Louis and terminated by

Lt. Morris. St. Louis wrote letters to Warden - Deputy Warden - Klein - Knight - disciplinary hearing officers and only Deputy Warden Pierce answered him. And an investigation started with no satisfaction to this point. This is the end of Lt Morris and the main kitchen's direct authority on this issue.

IM James St. Louis  
SBI# 446518 UNIT MHY 22 A (54)  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

*legit mail*

Office of the Clerk  
United States District Court  
844 W. King Street  
Wilmington Delaware  
19801-3576

ATT: Civil Case No. 06-236-SLR

*legit mail*

